

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

WOODBRIIDGE GROUP OF COMPANIES,
LLC *et al.*,¹

Remaining Debtors.

MICHAEL GOLDBERG, as Liquidating
Trustee of the Woodbridge Liquidation Trust,

Plaintiff,

V.

KENNETH HALBERT,

Defendant.

**REQUEST FOR ORAL ARGUMENT ON DEFENDANT’S MOTION TO EXTEND
DEADLINES IN THE AMENDED SCHEDULING ORDER**

Pursuant to Rule 7007-3 of the Local Rules of Bankruptcy Practice and Procedure of the United States Bankruptcy Court for the District of Delaware (the “Court”), Defendant Kenneth Halbert (the “Defendant”), hereby requests that the Court permit oral argument on Defendant’s Motion to Extend the Deadlines in the Amended Scheduling Order (the “Motion”) [Adv. Docket No. 131].

The Defendant respectfully submits that oral argument may aid the Court's decisional process on the Motion.

¹ The Remaining Debtors and the last four digits of their respective federal tax identification numbers are as follows: Woodbridge Group of Companies, LLC (3603) and Woodbridge Mortgage Investment Fund 1, LLC (0172). The Remaining Debtors' mailing address is 14140 Ventura Boulevard, #302, Sherman Oaks, California 91423.

Dated: December 1, 2022

WHITE AND WILLIAMS LLP

By: /s/ Rochelle L. Gumapac

Rochelle L. Gumapac (DE Bar No. 4866)

Agatha C. Mingos (DE Bar No. 5642)

600 N. King Street, Suite 800

Wilmington, Delaware 19801

Telephone: (302) 467- 4531

gumapacr@whiteandwilliams.com

mingosa@whiteandwilliams.com

and,

Heidi J. Sorvino (*pro hac vice pending*)

James Vandermark (*pro hac vice pending*)

Travis Powers (*pro hac vice pending*)

7 Times Square, Suite 2900

New York, New York 10036

sorvinoh@whiteandwilliams.com

vandermarkj@whiteandwilliams.com

Attorneys for Defendant Kenneth Halbert

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:)	
)	Chapter 11
WOODBIDGE GROUP OF)	
COMPANIES, LLC, <i>et al.</i> ,)	Case No. 17-12560 (JKS)
)	(Jointly Administered)
Remaining Debtors.)	
)	
MICHAEL GOLDBERG, in his capacity as)	
Liquidating Trustee of the WOODBRIDGE)	Adversary Proceeding No. 19-51027 (JKS)
LIQUIDATION TRUST,)	
)	
Plaintiff,)	JURY TRIAL DEMANDED
)	
v.)	
)	
KENNETH HALBERT,)	
)	
Defendant.)	
)	

NOTICE OF SERVICE

The undersigned hereby certifies that on December 1, 2022, a true and correct copy of **DEFENDANT KENNETH HALBERT'S REQUEST FOR ORAL ARGUMENT ON DEFENDANT'S MOTION TO EXTEND DEADLINES IN THE AMENDED SCHEDULING ORDER** caused to be served via Electronic Mail, upon the following:

Richard M. Pachulski, Esq. Andrew W. Caine, Esq. Bradford J. Sandler, Esq. Jason S. Pomerantz, Esq. Colin R. Robinson, Esq. PACHULSKI STANG ZIEHL & JONES LLP 919 North Market Street, 17 th Floor P.O. Box 8705 Wilmington, DE 19899	Kenneth N. Klee, Esq. Michael L. Tuchin, Esq. David A. Fidler, Esq. Robert J. Pfister, Esq. KTBS LAW LLP 1801 Century Park East, 26 th Floor Los Angeles, CA 90067
---	--

(Counsel for the Plaintiff)

/s/ Rochelle Gumapac
 Rochelle Gumapac